

March 15, 2022

The Honorable Matt Lesser, Co-Chair
The Honorable Kerry Wood, Co-Chair
The Honorable Tony Hwang, Ranking Member
The Honorable Cara Pavalock-D'Amato, Ranking Member
Insurance and Real Estate Committee
Connecticut General Assembly
Legislative Office Building, Room 2700
Hartford, CT 06106

RE: SB 360: An Act Concerning Various Changes to Utilization Review Companies Licensure Statute and HB 5391: An Act Concerning Mental Health.

Chairman Lesser, Chairwoman Wood, Vice Chairman Anwar, Vice Chairwoman Comey, Ranking Members Hwang and Pavalock-D'Amato and members of the Housing Committee:

My name is Kristina Chomick, I am a Licensed Marriage and Family Therapist (LMFT). I am a resident of Glastonbury and I have a private practice in Wethersfield. I am writing in support of SB 360 and HB 5391, with requested modifications to take into consideration below stated private insurance barriers and obstacles to Mental Health Providers in Connecticut.

Marriage and Family Therapists are employed in various clinical settings throughout the state, serving diverse mental health needs. Marriage and family therapists are specifically trained through a systemic lens, and have extensive training in treating individuals, couples, families and systems as problems arise. Additionally, many MFTs are in network with the various private insurance carriers that operate in our state.

Many providers are at full capacity and have waiting lists for new clients. Those providers who are well connected are finding their network of referral options are also full and have waitlists. Many higher levels of care facilities are at capacity and have extensive waitlists; placing outpatient providers in a difficult situation to manage higher level needs in less time and inappropriate settings. Many school systems are experiencing the spill over of untreated mental health disorders of their students within their school settings and environments.

We as mental health providers are doing all we can to address this crisis. Many MFTs in private practice do not have administrative support or limited administrative support. As a result, administrative burdens erected by private insurance companies place a significant burden on our profession. These barriers include: ever changing claim submission procedures; lengthy waits for service reimbursement; audits; claw-backs of previous payments and erroneous claim denials. These issues are driving mental health providers to remove themselves from provider networks. Those providers that choose to stay in-network are bogged down by time consuming paperwork and phone calls that could otherwise be used servicing Connecticut residents in need of mental health treatment.

As a provider, I have spent countless hours on the phone trying to resolve simple issues. From one specific company, I had to go to twitter to get a response from the company with answers as

my previous e-mails were met with replies that did not give any real answers. This specific company changed a policy on their end, and when we did what we were told to do, they held thousands and thousands of dollars' worth of claims for over a month in the "pending" stage while they tried to get their system up to date to actually accept the change they implemented.

I am a clinical supervisor, and as I am supporting clinicians who are beginning their own practices, many are met with panels that are "too full" from the insurance companies which feels highly unlikely as most therapists I know have full caseloads, waiting lists that are months long, and are still getting more and more calls each week with people trying to get into treatment.

The constant fear of audits and clawbacks for errors on the side of the insurance companies are always hanging over our heads. One insurance company sends a letter out periodically if you have too many "60 min sessions" that you have billed for across your caseload and request that you instead only bill for "45 min sessions".

The issues with insurance companies are truly countless and I cannot possibly list them all here. As part of the professional organization for Marriage and Family Therapists in Connecticut, we welcome you to utilize us as a resource for you and a bridge to our members as well

I ask that the utilization review requests outlined in SB 360 be capped; as to eliminate undue repeated auditing/review for providers and creating time consuming paperwork burdens that continue to impede the ability to treat clients.

I request that the study referenced in HB 5391 be carried-out by an independent task force that has representation from the Department of Insurance, (DOI) but not conducted by the Department. We also request that you utilize the task force outlined to review and recommend adjustments to private insurance regulations to reduce barriers and support private practitioners and mental health agencies.

I also recommend that the taskforce consider the following topics to review and provide recommendations on:

- Improved communication between providers and insurance representatives through regular updates to insurance panel lists of in-network providers.
- The development of systems and protocols that decrease claim processing times through standardization efforts for claims pending in "accepted" or "processing" status for extended periods of time. Systems and protocols should reduce errors and inaccurate denials of payment of claims.
- Creating clear guidelines for claim processing code adjustments, with advance notice to providers, and implementation of code changes after insurance systems are updated.
- Requiring standardized and regulated claim auditing protocols to reduce provider audits and monetary claw-backs from providers.

I urge you to support SB 360, with the addition of an appropriate cap of reviews as to not impede providers time and resources to treating clients. I urge you to support the establishment of a taskforce as outlined in HB 5391, with the above mentioned areas of consideration. The requested changes will reduce barriers for mental health providers and help improve access to mental health services for all Connecticut residents.

Thank you for your time on this important matter.

Sincerely,

Kristina J. Chomick, LMFT

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